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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
12

13 ALMONT AMBULATORY
14 SURGERY CENTER, LLC, a
15 California limited liability company, et
16 al.,

17 Plaintiffs,

18 v.

19 UNITEDHEALTH GROUP, INC.;
20 UNITED HEALTHCARE SERVICES,
21 INC., UNITED HEALTHCARE
22 INSURANCE COMPANY;
23 OPTUMINSIGHT, INC., and DOES 1
24 through 20,

25 Defendants.

26 UNITED HEALTHCARE SERVICES,
27 INC., UNITED HEALTHCARE
28 INSURANCE COMPANY;
29 OPTUMINSIGHT, INC.,

30 Counterclaim Plaintiffs,

31 v.

32 ALMONT AMBULATORY
33 SURGERY CENTER, LLC, a
34 California limited liability company; et
35 al.,

36 Counterclaim Defendants.

Case No. 2:14-cv-03053-MWF(VBKx)
Honorable Michael W. Fitzgerald

**REDACTED DECLARATION OF
IAN SHAKRAMY IN SUPPORT OF
COUNTERCLAIM DEFENDANT
JULIAN OMIDI'S OBJECTION
AND OPPOSITION TO DKT 258**

Date: March __, 2016

Time: 9:00 a.m.

Ctrm: 1600

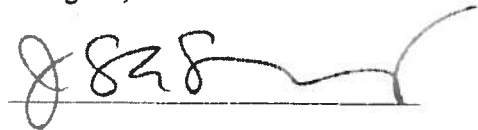
Honorable Michael W. Fitzgerald

DECLARATION OF IAN SHAKRAMY

I, Ian Shakramy, hereby declare and say:

1. I am a resident of the County of Los Angeles, State of California. I make this statement of my own personal knowledge. If called as a witness I would competently testify as follows:
2. I have been engaged as an attorney starting on November 2014 to assist in litigation matters involving Golden State Practice Management, Inc. and its affiliates, assignees and agents.
3. One of my earlier tasks was to investigate and obtain statements from patients who were part of an ongoing civil litigation with United Healthcare and a pending criminal investigation by the U.S. Department of Justice.
4. One such patient is example patient #14 of fifteen (15) original example patients in United Healthcare complaint, [REDACTED]
5. My colleague and I, James Fleming (another attorney), spoke to him at a local restaurant near his place of employment sometime in March of 2015. We asked him about his experience with the Lap Band surgery and prepared his statement for his review and signature.
6. [REDACTED] stated he was happy with the services provided and stated that no one had ever misled him, contrary to the United Healthcare lawsuit allegations. He was friendly to us and he communicated directly with James Fleming regarding any possible edits to his declaration. He committed sending a signed copy via email directly to Mr. Fleming. He also expressed interest in possibly pursuing a case against Allergan, the makers of the Lap Band, due to a design or manufacturing defect.
7. On or about June 2015, [REDACTED] and Mr. Fleming spoke by phone. I was nearby to hear Mr. Fleming. After the phone call, Mr. Fleming told me that [REDACTED] was visited by the FBI and seemed very upset. He didn't want to have any further contact with us.
8. In June and July 2015, James Fleming attempted to contact [REDACTED] several times. To my knowledge, [REDACTED] has not replied to Mr. Fleming's emails, nor has he returned any of Mr. Fleming's calls.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 27th day of January, 2016 at Los Angeles, California.



Ian S. Shakramy

1 PROOF OF SERVICE

2 I am employed and a resident of the County of Los Angeles, State of
3 California. I am over the age of 18 and not a party to the within action; my business
address is 6380 Wilshire Boulevard, Suite 820, Los Angeles, California, 90048.

4 On February 10, 2016, I served the document described as:
5 REPLY TO UNITED OPPOSITION TO RECUSAL, DKT 268

6 Upon the interested parties in this action as follows:
7 SEE ATTACHED SERVICE LIST

8 (By Mail) I am "readily familiar" with the firm's practice of collection and
9 processing correspondence for mailing. Under that practice, it would be deposited
10 with U.S. postal service on that same day with postage thereon fully prepaid at Los
Angeles, California in the ordinary course of business. I am aware that on motion of
the party served, service is presumed invalid if postal cancellation date or postage
meter date is more than one day after day of deposit for mailing contained in
affidavit.

11 (By Facsimile Transmission) I caused the foregoing document to be served
12 by facsimile transmission to each of the interested parties at the facsimile machine
telecopy number shown in the service list attached hereto.

13 X (By Electronic Mail/ECF) Pursuant to controlling General Orders and
14 LBR, the foregoing document will be served by the court via NEF and hyperlink to
the document. On 2/10/2016, I checked the CM/ECF docket for this bankruptcy case
15 or adversary proceeding and determined that the following persons are on the
Electronic Mail Notice List to receive NEF transmission at the email addresses
stated in the attached service list below:

16 I declare that I am employed in the office of a member of the bar of this court at
17 whose direction the service was made.

18 Executed on February 10, 2016, at Los Angeles, California.

19 /s/ Robert J. Rice
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SERVICE LIST

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COUNTERCLAIM DEFENDANT JULIAN OMIDI